

\*\*\*\*CONFIDENTIAL DEPOSITION\*\*\*\*

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IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - -

LEIGHTON TECHNOLOGIES, LLC, )

Plaintiff-Counterclaim )

Defendant, )

-vs-

) Case No.

) 04 Civ 2496 (CM)

OBERTHUR CARD SYSTEMS, S.A., )

Defendant-Counterclaim )

Plaintiff. )

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Videotaped deposition of WILLIAM SANKO,  
a witness herein, called by the  
Defendant-Counterclaim Plaintiff as if upon  
cross-examination, and taken before David J.  
Collier, RPR, Notary Public within and for the  
State of Ohio, pursuant to notice and subpoena,  
and pursuant to the further stipulations of  
counsel herein contained, on Thursday, the 1st  
day of December, 2005 at 9:02 a.m., at the  
Clarion Bel-Air Hotel, 2800 West 8th Street,  
City of Erie, State of Pennsylvania.

**Tackla**  
& Associates

Tackla & Associates

4020 Ohio Savings Plaza  
1801 E. Ninth Street  
Cleveland, Ohio 44114

216-241-3018 • Fax 216-241-3005

1 APPEARANCES:

2  
3 ON BEHALF OF THE PLAINTIFF-COUNTERCLAIM  
4 DEFENDANT:

5 Robert A. Gutkin, Esq.  
6 Sutherland, Asbill & Brennan  
7 1275 Pennsylvania Avenue, N.W.  
8 Washington, District of Columbia 20004-2415  
9 (202) 383-0100

10  
11 ON BEHALF OF THE DEFENDANT-COUNTERCLAIM  
12 PLAINTIFF:

13 Todd S. Sharinn, Esq.  
14 Frank M. Gasparo, Esq.  
15 Baker & McKenzie  
16 805 Third Avenue  
17 New York, New York 10022  
18 (212) 751-5700

19  
20  
21 ALSO PRESENT:

22 George H. Tackla, Videographer  
23  
24  
25

1 seen -- I've seen a customer use 75 PSI, lower  
2 than that.

3 Q So the low pressure is the pressure applied  
4 during heating?

5 A Yes.

6 Q And the high pressure is the high pressure  
7 applied during cooling?

8 A Yes.

9 Q Great.

10 And is this a record you would have  
11 kept in the ordinary course of your business?

12 A Yes.

13 Q And that is your handwriting?

14 A Yes.

15 Q Great. All right.

16 We're going to switch gears.

17 A Okay.

18 Q Are you familiar with a technique of  
19 counterbalancing the platens of a laminator?

20 A I am.

21 Q What does it mean to say that the platens  
22 of a laminator are counterbalanced?

23 A Laminators normally have one daylight  
24 opening and those platens are stacked one above  
25 the other. It's normal multiple day -- normally

1 multiple daylights, so there's a number of  
2 platens, maybe one to ten, 15. Counterbalanced  
3 platens to me would mean that as you -- because  
4 we're always -- or most always talking about  
5 up-acting hydraulic rams, as that ram would  
6 raise, the bottom daylight opening and the  
7 product in it would experience accumulated  
8 higher pressure as that ram went up until you  
9 got to the top opening, which would have  
10 experienced none of that.

11 Q Why would someone want to counterbalance  
12 platens during lamination?

13 MR. GUTKIN: Object to form.

14 A Because they -- obviously they wouldn't  
15 want pressure, more pressure, on one daylight  
16 opening than any other.

17 Q I'm sorry. I don't understand what you  
18 mean by they would want pressure, more pressure  
19 on one daylight opening than another.

20 A Oh, they wouldn't want it. They would not  
21 want more pressure. I mean, that -- that's the  
22 only reason that I could see that anybody would  
23 want counterbalanced platens. They -- they  
24 wouldn't want to have your bottom openings  
25 experience greater pressure than the top